

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

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MICHAEL SABELLA,

Plaintiff,

v.

Civil Action No.
06 – CV – 6566 (NG)(SMG)

**AMERICAN STEVEDORING, INC., and
LOCAL 1814 INTERNATIONAL
LONGSHOREMAN’S ASSOCIATION, AFL-CIO,**

Defendants.
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**DEFENDANT LOCAL 1814’S
NOTICE OF MOTION IN LIMINE**

PLEASE TAKE NOTICE that defendant Local 1814, ILA, AFL-CIO will move this Court before the Honorable Nina Gershon, United States District Judge, at the United States Courthouse for the Eastern District of New York, located at 225 Cadman Plaza East, Brooklyn, New York 11201, in advance of trial scheduled to commence on November 10, 2014, for an Order pursuant to Rules 401, 402, and 803 of the Federal Rules of Evidence (1) prohibiting Plaintiff from arguing or eliciting testimony speculating that Local 1814 President Louis Pernice asserted his influence to have Plaintiff banned from working at New York Container Terminal on Staten Island; and (2) excluding from evidence a July 27, 2006 letter from the EEOC as inadmissible hearsay.

Defendant Local 1814 further relies on a memorandum of law submitted herewith.

Dated: New York, New York
October 1, 2014

MARRINAN & MAZZOLA MARDON, P.C.

By: /s/John P. Sheridan
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*Attorneys for Defendant
Local 1814, International
Longshoremen's Association, AFL-CIO*

CERTIFICATE OF SERVICE

I hereby certify that on October 1, 2014, the foregoing was served via ECF upon all counsel of record.

/s/ John P. Sheridan
John P. Sheridan